

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 23-cr-60143-RS

UNITED STATES OF AMERICA,  
Plaintiffs,  
vs.

STUART LEIBOV,  
Defendant.

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**UNOPPOSED MOTION FOR CONTINUANCE**

COMES NOW the Defendant, STUART LEIBOV, by and through undersigned counsel and moves this Honorable Court to grant this motion and enter an order continuing the Calendar Call currently scheduled on November 14, 2023.

As grounds for this motion, the Defendant would show the following:

1. The Defendant has been charged by Information with Possession and Receipt of Child Pornography in violation of 18 U.S.C. § 2251 and Enticement of a Minor to Engage in Illicit Sexual Activity in Violation of 18 U.S.C. § 2422.
2. There is a Calendar call scheduled on November 14, 2023.
3. That the undersigned was recently retained by the Defendant to assist in the defense of this matter.
4. The undersigned recently finished trying a sexual battery case before the Honorable Jose Martinez; said trial lasting one week.
5. That Governor Ron DeSantis then called a Special Session of the Florida Legislature and the undersigned, in his capacity as a Florida State Representative, was required to be in Tallahassee beginning November 6, 2023, and returning November 16, 2023.
6. That undersigned has contacted AUSA Catherine Koontz, who has advised that she has no objection to this continuance.
7. The period of delay resulting from the granting of this continuance, to and including the

date the trial commences, shall be deemed excludable time in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. ' 3161, et seq.

8. This motion is made in good faith and not for purposes of delay.

WHEREFORE, it is respectfully requested that this Honorable Court enter an order continuing the Sentencing presently scheduled on November 7, 2023.

/s/ Michael A. Gottlieb  
Michael A. Gottlieb, P.A.  
Florida Bar No.: 981133

I HEREBY CERTIFY that a true copy of the foregoing Motion for Continuance has been electronically filed with the Clerk of Court using CM/ECF this 7<sup>th</sup> day of November, 2023.

/s/Michael A. Gottlieb  
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